

ARKWOOD, INC. SUPERFUND SITE



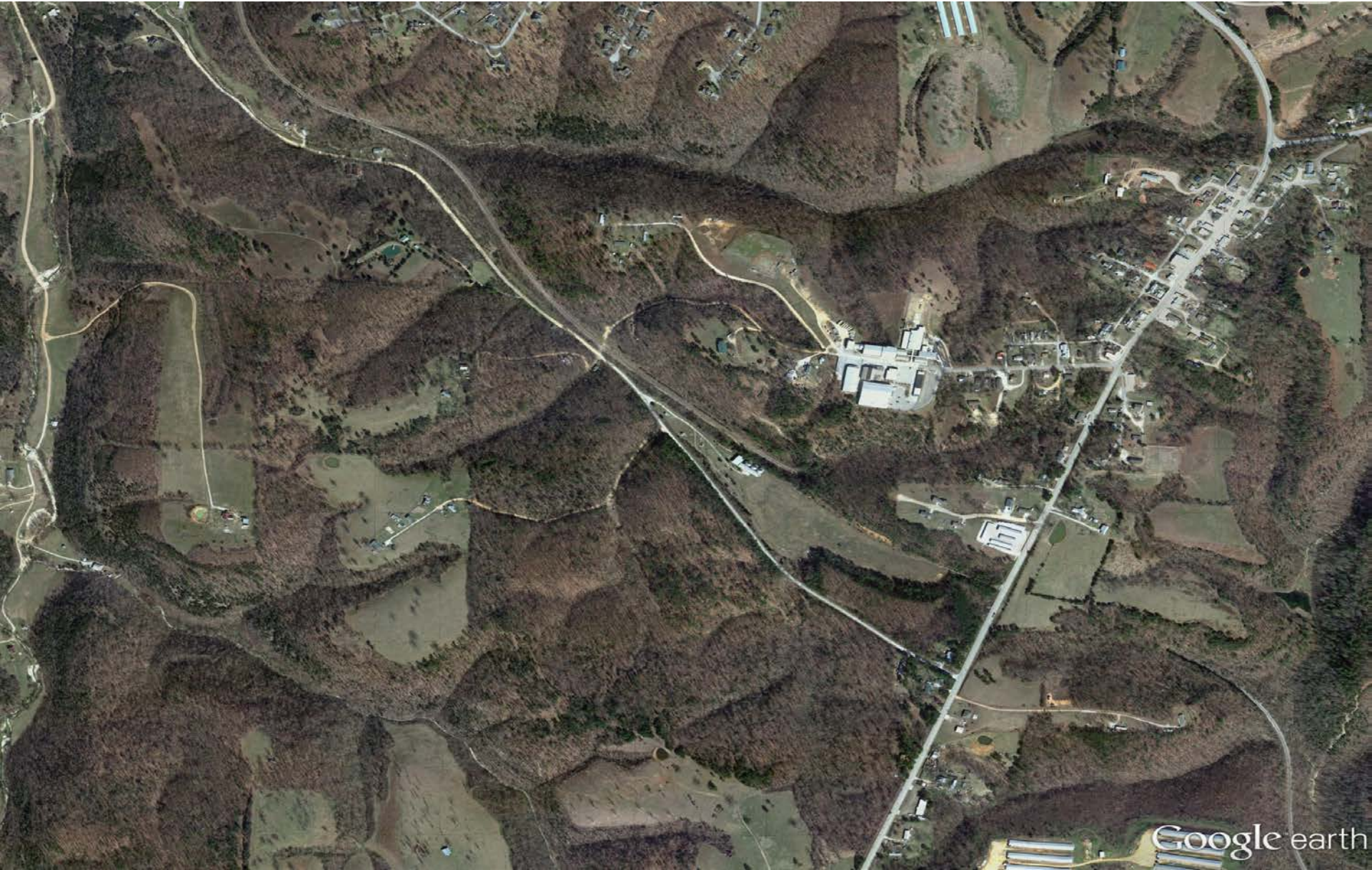
U.S. EPA, REGION 6
October 2015



9643657



SITE MAP





SITE MAP



— Capped Area
— Excavated Areas



HISTORY

- 1962-1984: Wood treating operations
- 1985: NPL Proposed
- 1989: NPL Final
- Contaminants:
 - Dioxin (2,3,7,8-TCDD)
 - Pentachlorophenol (PCP)
 - Polynuclear aromatic hydrocarbons (Benzo(a)pyrene)



EPA REMEDY

- 1990 ROD:
 - Soil risk goal set at industrial scenario
 - Dioxin: 20 $\mu\text{g}/\text{kg}$ (ppb) = 20,000 ppt
 - PCP: 300 mg/kg (ppm)
 - B(a)P: 6 mg/kg (ppm)
- excavation, on-site incineration (off-site 1995 ESD), and 6" soil cap
- MNA with PCP treatment as contingency (implemented in 1997)



ISSUES

- **FOIAs**
- Dioxin Reassessment
- Five Year Review
- Deletion



FOIAs

Superfund Division has received
12 Arkwood FOIA requests since

October 31, 2014:

Superfund Division has received
and cleared 8 of the FOIAs



FOIAs

EPA Region 6 Superfund Division is Currently Processing 4 Open FOIAs:

Superfund Division:

EPA-R6-2016-000337 – Received 10/13/2015 – Current target date is 11/10/2015

EPA-R6-2015-008746 – Received 07/08/2015 – Current target date is 11/06/2015

EPA-R6-2015-008477 – Received date 06/29/2015 – Current target date is 10/30/2015

EPA-R6-2015-008325 – Received 06/24/2015 – Current target date is 10/26/2015

Water Quality Division:

EPA-R6-2015-009318 – Cleared for Superfund on 08/06/2015 – Still in process by 6WQ



FOIAs

EPA-R6-2015-008325:

Request date: 06/24/2015

Current target date: 10/26/2015

Subject of Request:

Referring to Congressman Steve Womack's inquiry in 2013 - Can EPA confirm that the above assessment was an accurate characterization of EPA's intent with regard to Arkwood at the time of Mr. Weaver's writing? If so, has that intent changed since the time of Mr. Weaver's writing? Could EPA please reiterate and update its current position with regard to Mr. Weaver's questions and concerns contained in the full text of the Congressional inquiry and with reference to EPA responses from Ms. Thomas, as attached hereto?



FOIAs

Current Status of EPA-R6-2015-008325:

Site Files and Documents:

- Total number of potentially responsive documents: 361
- Total number of documents reviewed: 361 - Completed
 - 17 potentially responsive documents located in SEMS
 - 344 Potentially Responsive Documents retrieved from Stephen Tzhone – Documents provided on a metadata for review – Review completed on 10/06/2015.
- How many documents released: 11
- How many non-responsive documents: 90
- How many sensitive/redacted documents: 11

Partials Completed: 1

- A first partial of 11 documents submitted for concurrences on 09/17/2015; the first partial cleared on 09/23/2015
- A second partial of 249 documents being prepared for concurrences



FOIAs

EPA-R6-2015-008477:

Request Date: 06/29/2015

Current Due Date: 10/30/2015

Subject of Request:

Referring to updating the Community Involvement Plan - Please provide all documentation (including correspondence, emails, progress reports, cost details, contractors and staff involved, with job descriptions, roles and responsibilities, timelines. etc.) related to the development and completion of the updated CIP for the Arkwood site. Please provide all Arkwood-related correspondence, including emails, by, to, from, cc'd to or referring to EPA staff person Donn Walters, Community Involvement.



FOIAs

Current Status of EPA-R6-2015-008477:

Site Files and Documents:

- Total number of potentially responsive documents: 425
- Total number of documents reviewed: 425 - Completed
 - 160 documents located in SEMS as potentially responsive – Reviewed by Donn Walters – Review completed on 07/31/2015.
 - 13 documents submitted by Ben Banipal – Confirmed Non-Responsive
 - 252 documents retrieved from Donn Walters – Provided on a metadata – Review completed on 09/25/2015.
- How many documents released: 246
- How many non-responsive documents: 13
- How many sensitive/redacted documents: 58

Partials Completed: 1

- A first partial consisting of 246 documents was submitted for concurrences on 09/18/2015; first partial cleared on 09/29/2015
- A 2nd partial of 137 documents is in concurrences as of 10/01/2015



FOIAs

EPA-R6-2015-008746:

Request Date: 07/08/2015

Current Target Date: 11/06/2015

Subject of Request:

Requesting all communications February 4, 2015 to July 7, 2015 by, for, to, between, or copied to: EPA Region 6 (its staff, managers, employees, representatives, contractors, agents etc.) and McKesson Corporation (its employees, agents, representatives, contractors, etc. and that of any McKesson predecessor or subsidiary entity, including Mass Merchandisers Inc. aka "MMI");

EPA R6 (its staff, managers, employees, representatives, contractors, agents, etc.) and that of Arkansas Department of Environmental Quality (ADEQ) or its predecessor entity Arkansas Department of Pollution Control and Ecology (ADPC&E); EPA Region 6 (its staff, managers, employees, representatives, contractors, agents etc.) and that of any other governmental or jurisdictional entity be it federal, state, county, local or other; and EPA Region 6 staff members or cleared contractors communicating within the agency.



FOIAs

Current Status of EPA-R6-2015-008746:

- **Total number of potentially responsive documents: 567**
- **Total number of documents reviewed: 567**
- **Total number of documents under review: 10 - with Gloria Moran as of 10/06/2015 (Stephen Tzhone requested that Gloria review for final determination)**
- **Total number of documents released: 32**
- **Total number of documents confirmed non-responsive: 412**
- **Total number of documents confirmed sensitive/redacted: 9**

Partials Completed: 1

- **A first partial of 32 documents was submitted for concurrences on 09/18/2015; first partial cleared on 10/05/2015**
- **A second partial consisting of 114 documents is being prepared**



FOIAs

EPA-R6-2016-000337

Request Date: 10/12/2015

Current Due Date: 11/10/2015

Subject of Request:

Requesting any and all documents in EPA's possession constituting or reflecting communications between C.C. "Bud" Grisham and C.C. "Curt" Grisham, Jr. and the EPA between the dates of April 28, 2015, to the present date of October 12, 2015, which we understand to be the last date information was provided by your office, and the date of the response.



FOIAs

Current Status of EPA-R6-2016-000337

- **Total number of potentially responsive documents located in SEMS – 101**
- **Stephen Tzhone will submit documents for processing on 10/26/2015.**
- **All other Site Team members have confirmed all documents have been previously submitted and are in SEMS.**
- **The requester was contacted on 10/21/2015 for an extension and fee commitment; waiting on confirmation from requester.**



ISSUES

- FOIAs
- **Dioxin Reassessment**
- Five Year Review
- Deletion



DIOXIN REASSESSMENT

- February 2012: new EPA soil PRGs:
 - 50 ppt residential
 - 664 ppt commercial/industrial
 - May 2014: EPA soil PRGs updated:
 - 51 ppt residential
 - 730 ppt for commercial/industrial
- *1990 ROD: 20,000 ppt for industrial scenario



DIOXIN REASSESSMENT

- October 2014 - January 2015:
 - soil sampling
 - ground water dye tracing
- March 2015 validated results:
 - Soil: 6" cap intact; however, levels above new industrial PRG found outside cap
 - GW: No dye was found except at one spring currently under active treatment; however, water seeps bypassing spring observed



DIOXIN REASSESSMENT

- September 2015 final comments from HQ:
 - HQ concurs & concludes with protectiveness of intact 6" cap
 - HQ concurs with development of additional risk scenarios for soil areas outside of cap (i.e. trespasser, recreation, maintenance worker)
 - HQ requests dioxin colloidal transport investigation and additional gw dye trace study at high flow



DIOXIN REASSESSMENT

- September 25, 2015: ADEQ concurs with path forward
- October 9, 2015: R6 sends soil + gw comments letter to PRPs
- December 31, 2015: PRP response due date



ISSUES

- FOIA
- Dioxin Reassessment
- **Five Year Review**
- Deletion



FIVE YEAR REVIEW

- August 18, 2011: Previous FYR identifies Institutional Control (i.e. 2010 deed notice) required correction
- May 29, 2014: Corrected deed notice filed in Boone County courthouse
- June 2015: New FYR planning starts, ADEQ lead
- July 22, 2015: FYR community notice published in Harrison Daily Times newspaper



FIVE YEAR REVIEW

- October 13-16, 2015: FYR community interviews conducted
- October 15, 2015: Site inspection conducted
- April 2016: ADEQ draft report to EPA
- June 2016: ADEQ final report to EPA
- August 18, 2016: EPA signature



ISSUES

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DELETION

- November 2011: Landowner son requested site partial deletion
- Partial deletion for soils will be reviewed after dioxin reassessment



PATH FORWARD

- Continue coordination with EPA HQ & ADEQ
- Community Involvement:
 - Community Involvement Plan (original June 8, 1992) update in progress; completion in FY2016 after integration of new EPA Site Profile Pages and updated Internet links
- ATSDR/ADH: Public Health Assessment (original August 1, 1988) update in progress; completion in FY2016/17 after integration of new field data